

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

THE GENERAL SHIP REPAIR CORPORATION,

Plaintiff,

v.

Case No. 1:20-cv-02503-RDB

TUG MS JANET, *in rem*,

and

HOST TERMINALS, LLC,

Defendants.

**DEFENDANT’S REQUEST FOR ENTRY OF DEFAULT ON COUNTERCLAIM**

**To: Clerk of Court**

Defendant and Counterclaimant, Host Terminals, LLC (“Host Terminals”) by counsel, hereby requests the entry of default pursuant to Federal Rule of Civil Procedure 55(a) and Local Rule 108.2, against Plaintiff, The General Ship Repair Corporation (“GSR”), for failure to file an answer to the Counterclaim filed by Host Terminals within the time allowed by law. In support thereof, Host Terminals states:

1. GSR filed a Complaint commencing this action on August 31, 2020.
2. By motion filed November 9, 2020, GSR sought leave of this Court to file an Amended Complaint substituting Host Terminals, LLC, for the *in personam* Defendant initially named in the Complaint.
3. By Order entered November 19, 2020, this Court granted the motion and ordered the Amended Complaint be deemed filed on the date of the Order.
4. On November 24, 2020, Host Terminals electronically filed an Answer and Counterclaim in accordance with Federal Rules of Civil Procedure 8, 12 and 13(a) and served by

Notice of Electronic Filing sent to counsel for Plaintiff in accordance with Fed. R. Civ. P. 5(a) and Local Rule 102.1(c).

5. Rule 12(a)(1)(B) requires a party to “serve an answer to a counterclaim or crossclaim within 21 days after being served with the pleading that states the counterclaim or crossclaim.”

6. More than 21 days have passed since service of counterclaim.

7. In accordance with Local Rule Local Rule 108.2, the last known address of GSR, counter-defendant and Plaintiff, is:

THE GENERAL SHIP REPAIR CORPORATION  
1449 Key Highway  
Baltimore, Maryland 21230-5191

Respectfully submitted,

/s/ Ann B. Brogan  
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/s/ James R. Jeffcoat  
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*Attorneys for Defendant Host Terminals,  
LLC*

**CERTIFICATE OF SERVICE**

**I CERTIFY** that on January 6, 2021, a copy of Defendant's foregoing Request for Entry of Default on Counterclaim was served via ECF filing on:

James W. Bartlett, III (00017)  
Semmes, Bowen & Semmes  
25 South Charles Street, Suite 1400  
Baltimore, Maryland 21201  
*Attorneys for Plaintiff,*  
*The General Ship Repair Corporation*

/s/ Ann B. Brogan  
Ann B. Brogan